*Prepared for:*
Licensing Administration Office
MINISTRY OF TRANSPORTATION

# PLP ADVISORY PANEL REPORT

## PERSONALIZED LICENCE PLATE PROGRAM REVIEW

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## 1.0 BACKGROUND

The province of Ontario has offered motorists the option to purchase a personalized licence plate (PLP) since 1973. The program gained popularity in 1983, when rules were relaxed so that plates could include six characters in any desired alphanumeric permutation.

In 2000, with the introduction of graphic plates and an increase in the number of characters permitted to eight, the number of PLPs in circulation have grown to over 334,000 - 4.5 per cent of the total plates in Ontario.

The PLP program came to public attention in 2007 when the Ministry of Transportation (MTO) declined a replacement of a personalized plate. The ensuing controversy resulted in the Government ordering a review of the PLP program. This review included the convening of a special Advisory Panel by the Public Appointments Secretariat, comprised of both experts and members of the public.

This report presents the findings and recommendations of the Advisory Panel, which are provided as advice to the Registrar of Motor Vehicles for consideration in the future evolution of the PLP program.

## 2.0 INTRODUCTION

The PLP program is administered by the Licensing Administration Office of MTO, supported by ServiceOntario as the customer-facing service delivery arm of the Ontario Government. MTO owns policy accountability for the program, and service delivery is performed by ServiceOntario in accordance with MTO policy parameters.

All requests for a personalized license plate are reviewed using a set of criteria developed by the Licensing Administration Office to ensure that plates are not deemed to be offensive to the citizens of Ontario.

The criteria consist of 10 categories that each plate application is evaluated against to determine whether a plate is permissible. The criteria have been reviewed twice, in 2001 and 2005, to reflect cultural and societal changes in language.

For many years until December 2007, both new plate applications and requests for replacements were reviewed under the current program criteria. During a review in December 2007 a specific replacement plate request for a plate already issued and on the road was rejected ("REV JO"), resulting in public and media controversy which questioned the rationale of the review criteria and the current program process.

Since December, all replacement plate requests have been automatically approved. Pending the outcome of the Advisory Panel's review, a senior management review team (SMRT), comprised of representatives from both MTO and ServiceOntario ("the Ministries"), meet weekly to review the PLP plates rejected by the working group. Other potential changes to the program have awaited the findings and recommendations of this Advisory Panel.

## 3.0 THE ADVISORY PANEL

An Advisory Panel, made up of both experts and citizens of Ontario, was formed in August 2008 to review the PLP program. The names of the Panel are: David Reed, Millicent Dixon, James Cowan, Gazira Chan, Robert Cornelius, Ryan Fritsch, and Isabel O'Reilly.

The direction of the Advisory Panel was set out in the following objectives:

1. The criteria are to be reviewed with respect to their reasonableness, relevance and comprehensiveness.

2. The processes followed by the PLP review committee for the screening of customer requests will be researched and reviewed.

3. The structure, composition and diversity of the PLP review committee will be examined.

4. The tools and resources currently used by the review committee will be evaluated to determine if they are still appropriate and whether they can be improved.

5. Analysis of PLP programs in other jurisdictions to be reviewed.

This report details the discussions and recommendations of the Advisory Panel as they reviewed the PLP program in terms of the review criteria, processes and structure.

## 4.0 GUIDING PRINCIPLES FOR PLP

It was established at the outset by the Advisory Panel that some governing principles would provide a useful over-arching structure for the PLP program.

The principles were developed through a process of facilitation and group discussions. They formed the bedrock for all deliberations concerning the program's criteria, processes and structure. In addition, they provide clarity as to the intent of the Advisory Panel, and provide guidance which cuts across all of the individual criteria.

This section both 1) summarizes the discussions of the Panel in the development of the principles, and 2) details the agreed-upon principles at the end of the section.

### 4.1 PANEL DISCUSSIONS

The Advisory Panel discussions concerning the creation of principles focused on what standards should be set for the PLP program.

#### 4.1.1 Program Cost Recovery

The Panel felt that the Ministries should, at a minimum, recover the cost of issuing PLPs. It was acknowledged that while the program is revenue generating, the cost of plates should remain at an affordable level.

#### 4.1.2 Freedom of Expression

It was the opinion of the Panel that the spirit of the PLP program is to allow applicants the freedom to express themselves. The right to individual expression, however, needs to be balanced with the requirement to respect community standards, consistent with the fact the license plates are government-issued property (and remain the property of the Crown), and are not merely the equivalent of bumper stickers.

#### 4.1.3 The Need for Review

The Panel was in total agreement that a review of all new plate applications should continue to take place to ensure that no plate is issued that may be deemed to be offensive or inappropriate to the citizens of Ontario. The current criteria, however, would need to be reviewed to ensure that they were meeting the needs and requirements of applicants.

### 4.1.4 Periodic Review of Criteria

Moreover, the Panel recommended a regular review of the criteria every five years so that the criteria could adequately reflect changes in culture and language. It was felt that this five-year review should include outside input similar to the current Advisory Panel.

### 4.1.5 Customer-Friendly and Transparent Process

The PLP program should be customer-friendly and be available through a number of channels. The criteria used to review applications should be easy to understand for both the review committee who are required to apply them, and for applicants who need to adhere to them in making applications.

The Panel decided that where possible each criterion should have supporting examples of what is and is not permissible. They felt this would help speed up the review process and reduce the number of plates that are escalated by the review committee to senior management for decision.

In the interests of transparency, it was felt that the communication of a plain-language summary of all review criteria would assist both ministries' employees and potential applicants.

### 4.1.6 "Common-Sense" Application of Criteria

The Panel agreed that the review committee should apply a common-sense approach when reviewing plate applications. It was felt that the 'REV JO' incident demonstrated that although strict criteria are required the review committee should also apply common-sense and reasonability in determining what would be offensive to citizens of Ontario.

It was recognized that as much clarity as possible was desirable to assist in setting guidance for "common-sense" application of the criteria. There was strong endorsement that if an application could reasonably be expected to offend an identifiable portion of the population it should be disallowed.

### 4.1.7 Multiple Meanings

The Panel discussed multiple meanings of words, phrases and names used in plate applications and how they could be misconstrued.

It was agreed by the Panel that where words, phrases or names have multiple meanings and one of those meanings would contravene one of the criteria (i.e. where the

commonly recognizable meaning of the word would be considered offensive); then the application should be rejected. This would apply even in instances where other meanings are benign, and regardless of the stated intent of the applicant.

### 4.1.8 Interpreting Meaning

The Panel discussed the current methods of the review committee of parsing proposed configurations of characters to determine if any component of the plate request would violate the criteria. The Panel agreed with the necessity for the existing practice of breaking words down to determine potential meanings, but reiterated the need for common-sense.

To aid the review committee, the Panel felt that they should examine the predominant meaning of a word in instances where the meaning could be reasonably comprehended (e.g. NICEBASS [the word bass is a fish] compared to BADASSP [where the reasonably comprehended meaning could be ASS as ASSP is not a word]).

In addition, the Panel felt that interpretation of meaning should be evidence-based, and supported by research (e.g. Urban Dictionary and other resources currently used), and not rely only on the intuition of review committee members. Similarly, it was felt that if an initial round of research did not yield evidence of objectionable meaning which would lead to plate rejection, that it should be approved.

### 4.1.9 Consistency and Fairness

The Panel felt consistency and fairness in all stages of the PLP program was imperative. This would include the initial customer experience when a decision is made, to how the criteria is applied and; finally, on the recall process.

### 4.1.10 Simplicity

To support the principle of consistency and fairness, simplicity was seen by the Panel as a core principle. The Panel felt that wherever possible, the criteria and their interpretation should be framed as simply as possible, for the benefit of both review committee members and applicants.

The Panel also felt that the review process should be as simple as possible, and that communication regarding the program should also be as simple and clear as possible.

The principles reached and agreed by the Advisory Panel offer both Ministries important guidance and direction that cuts across the individual criteria, and offers additional parameters for how the criteria should be applied.

The principles are intended to support the PLP program by providing:

- Best-practice standards in eliminating offensive and inappropriate statements
- Greater transparency of the PLP program
- Delivery of enhanced customer service

## 4.2 THE PRINCIPLES

The agreed upon principles are set out below:

1. The program should be self-funding and MTO should not, in any respect, subsidize the program.

2. The program should allow freedom of expression but should not cause or be likely to cause embarrassment to the Crown.

3. The ministries should endeavor to approve as many plate requests as possible that are within the permitted criteria.

4. Issued plates should not reasonably be expected to cause offense to any identifiable group.

5. The criteria should be reviewed every five years to ensure that they adequately reflect changes in culture and language. The review should include outside input (e.g. Advisory Panel).

6. The program's processes should be customer-friendly and its criteria easy to understand for members of the public.

7. The program processes need to be transparent and accessible to applicants.
8. The number of plates that require escalation should be reduced by providing criteria that are straight-forward, easy to interpret and offer greater clarity through the use of examples.

9. The review committee should adopt a common-sense approach in determining the suitability of licence plates while maintaining a level of due-diligence.

10. In circumstances where a plate request has multiple meanings and one of those meanings would contravene one of the criteria (i.e. where the commonly recognizable meaning of the word would be considered offensive); then the application should be rejected; even if other meanings are benign, and regardless of the stated intent of the applicant. (For instance, an applicant whose initials are 'BJ').

11. Plate applications should only be rejected on the basis of evidence-based research; and rejected applicants should have the right to have their application reconsidered.

12. The program should be applied consistently and fairly to all applicants.

13. The program processes should be as simple as possible, for the benefit of both review committee members and applicants. Achieving simplicity in the review process and in customer communication (i.e. letters, information on the criteria etc...) would ensure that the program's processes are clearly comprehended.

14. Contravening any one category or sub-category of the criteria is sufficient for the review committee to reject a plate application.

## 5.0 PLP CRITERIA

A set of review criteria give life to the principles defined by the Panel, and created the parameters of unacceptable licence plate applications, providing guidance to the review committee in performing its work.

The Panel reviewed each of the ten current criteria in detail (see Appendix 8.1 - Current and Proposed Criteria), and considered whether existing criteria should be modified or even eliminated, as well as whether additional criteria were appropriate. The Panel had a healthy discussion on each of the criteria, and concluded that most criteria could benefit from some revision; ranging from minor clarification of current intent, to significant and substantive change in the essence of what is considered acceptable.

### 5.1 PANEL DISCUSSIONS

#### 5.1.1 Sexual

There was a unanimous and immediate agreement by the Panel that overtly sexual terms and sexually explicit and offensive language should not be permissible under the PLP program.

While reviewing the current category it was decided that the term 'innocuous' should be removed as it did not matter whether an applicant thought their plate to be innocuous if the meaning could be misconstrued (e.g. the number 69). This decision supported the principle of how to deal with multiple potential meanings.

#### 5.1.2 Abusive, Obscene Language and Derogatory Slang

The Panel was in broad agreement to retain this category. The discussions in developing the principles created a statement that concisely described how this criterion should be measured; that the ministries should ensure through the process of reviewing plate applications that no licence plate is issued that could reasonably be expected to cause offense to any identifiable group.

The Panel noted that the generational gap in the recognition and understanding of abusive, obscene and derogatory language has grown with new technology (e.g. text-messaging). Consequently, it endorsed the range of current practices of the review committee in exploring phonetics, mirror images, slang, abbreviations and text-messaging vernacular, and recommended that these continue to be investigated to filter out obscene, derogatory and offensive requests; as would happen across all the review criteria.

### 5.1.3 Religion

The Panel explored and discussed at length on whether some religious connotations should be permissible on licence plates, and if so, what type. The existing criterion on religion stipulates that no religious word or phrase is permitted on a licence plate. It was the Panel's opinion that this did not support the principle of freedom of expression, and seemed inconsistent with current community standards.

The Panel explored and discussed at length on whether some religious connotations should be permissible on licence plates, and if so, what type. Some Panel members expressed concern that having religious statements on government owned property may remove the distinction between church and state.

Ultimately, the Panel reached a majority recommendation that positive expressions of religious beliefs, religious titles, references to passages from scriptures, and religious celebrations, symbols and mythology should be allowable. However, the new criteria would still exclude any negative, pejorative, derogatory and proselytizing statements relative to any religion, and prohibit any claim of exclusivity or superiority of one religion over any other.

Following the development of the proposed criterion, the Panel felt that the review committee may face undue burden researching biblical passages and trying to interpret their meaning. The Panel agreed that the use of religious passages should be permitted. The Panel was of the opinion that religious scriptures and passages would be easily interpreted by the review committee. It was agreed, however, that the review committee may be required to consult with external subject matter experts if necessary on the interpretation of religious passages, in the event that the meaning is ambiguous or cannot be clearly determined to be either negative, pejorative, derogatory or proselytizing relative to any religion, or exclusivity or superiority of one religion over any other.

### 5.1.4 Drugs/Alcohol

The Panel wished to retain this criterion. It was the opinion of the Panel that all forms of drugs, legal or illegal, that could impair motor vehicle operation should be prohibited, given the context (i.e. license plates for motor vehicles). There were lengthy discussions on whether names of wine or beer producers (e.g. Jackson Triggs, Coors etc.) should be permitted, but the Panel eventually decided that a blanket ban on all alcohol-related words (e.g. brands, types, producers etc.) was the appropriate guideline.

The Panel, however, agreed that the review committee would need to take a common-sense approach and look at the entire meaning of the plate application to determine if the message promotes drugs or alcohol. The Panel felt that a plate such as "REV JO", where Rev is also an alcoholic drink, should be permissible as it clearly implies an

occupation rather than promoting an alcoholic brand. This should be rooted in the principle of common sense in determining the predominant meaning of a given application.

### 5.1.5 Dignitaries/Law Enforcement Officials

It was explained to the Panel that this category was created to prevent individuals from posing as dignitaries or law enforcement personnel. Moreover, it ensures that individuals do not receive preferential treatment or identify drivers and thus endanger their personal security.

The Panel discussed the requests that the PLP program receives in this criterion and the difficulties for the review committee in deciding whether a public figure's proper name is or is not permissible. The Panel decided to clarify this point by recommending expansion of the category to exclude names of politicians and other public figures. To reflect this change, the Panel recommended amending the title of this criterion to 'Political Figures, Dignitaries and Law Enforcement Officials'.

### 5.1.6 Violence/Criminal Activity

The Panel decided that anything that could provoke or incite violence and/or criminal activities, including geopolitical variables such as references to war or terrorism or related subjects, should be prohibited.

There was discussion surrounding the differing sensibilities of urban and rural committees in relation to weapons and firearms. The Panel agreed, however, that the use of weaponry terminology on licence plates could reasonably be expected to cause offense and, in some cases, intimidation to road-users and should, therefore, continue to be banned. As a result, the criterion was retained in its entirety.

### 5.1.7 Racism

The Panel felt that the title of this criterion was not reflective of all the forms of discrimination that this category prohibits. It was suggested to connect this criterion and its contents with the Human Rights Code. The Panel agreed unanimously that this approach would set best-practice standards for the PLP program and give the criterion greater understanding to potential applicants.

On review of the Human Rights Code, the Panel determined that some of the phraseology of the existing criterion was outdated and would need to be amended so that the language in the criterion mirrors language and terms used in the Human Rights Code.

To reflect the changes in terminology it was agreed by the Panel to re-name the criterion 'Human Rights Discrimination'.

### 5.1.8 Road Safety

It was explained to the Panel that the original aim of this category was to prohibit the use of terms that indicated speed to discourage illegal street-racing on the roads of Ontario, and to promote the Ministry's road safety goals.

The Panel discussed whether licence plates with words associated with speed or racing would be likely to offend the citizens of Ontario. The Panel unanimously agreed that they did not find the association with speed or racing to be offensive and so decided to recommend removing this criterion from the list.

### 5.1.9 Law Enforcement Purposes

This criterion exists to prevent plates being approved that would be difficult to read for law enforcement purposes for both law enforcement officers and members of the public (i.e. potential witnesses).

It was agreed by the Panel that the title should be amended to reflect the purpose of the category and to make it more comprehensible to potential applicants. As a result, the criterion was re-titled 'Clarity and Readability'.

Staff from both ministries asked the Panel for advice on what the parameters for this category should be (e.g. how many identical characters can be used in sequence, the use of interchangeable letters and numbers?). The Panel agreed that no more than four identical characters could be used on a licence plate; but reiterated that the review committee should still view, when deemed necessary, the plate prior to issuance to determine the plate's clarity and legibility as a final check.

In addition, the Panel thinks that variations of similar licence plates should be permitted using interchangeable letters and numbers, subject to conformance with all other criteria. It is the Panel's view that a PLP is easier for members of the public to remember than a regular series plate, even when there may be several similar combinations in circulation.

### 5.1.10 Graphic + Characters

It was explained to the Panel that this category exists to prevent license plate requests being approved where the use of a graphic or character in the composition of the licence plate may cause offense or violate the current contract with the graphic plate partner. The Panel agreed to retain this criterion in its current form.

### 5.1.11 Trademarks

The Panel felt it was prudent for the ministries to consider a new criterion that deals specifically with trademarked names, words and phrases. The rationale for this is to prevent individuals maliciously applying for and receiving licence plates that identify brands and companies and, therefore, preventing legitimate applications from individuals or companies.

The Panel recommended that this new criterion should be explored by the Ministry of Transportation through obtaining legal counsel.

## 5.2 THE PROPOSED CRITERIA

The finalized set of proposed criteria following discussions with the Panel are set out below (see Appendix 8.1 - Current and Proposed Criteria).

### 5.2.1 Sexual

a. Sexual messaging or sexual connotation including reference to sexual body parts such as breasts, genitalia, pubic area, buttocks or relating to sexual and eliminatory functions, a term for or most closely associated with a sex act, or the availability for sex (e.g. BUBBIES, MYBUMPS, THRUST, RIDEME, PIMPIN etc.).

### 5.2.2 Abusive, Obscene Language and Derogatory Slang

a. Abusive, vulgar, derogatory, obscene or profane language (e.g. LILHOZR, IH8EVRY1 etc.).
b. A known slang term in any language, abbreviation, phonetic spelling, text-messaging vernacular or mirror image (e.g. STUCATZZ etc.).
c. Term of lust or depravity or carries a prurient meaning, or which may otherwise be vulgar or indecent (e.g. HUMMERZ, WETTVETT etc.).
d. Swear word or term considered profane, obscene or repulsive (e.g. SH1T, FCUK etc.).
e. Word or saying in a foreign language, which can be translated to mean something offensive (e.g. BUKAKE, FUNGOOO etc.).

### 5.2.3 Religion

a. Positive or neutral expressions of religious beliefs and mythology are permissible; including references to religious celebrations, titles, leaders and symbols. All religions and beliefs are permissible (e.g. Christianity, Judaism, Islam, Sikhism,

Hinduism etc.) subject to the constraints below (e.g. IBLVJC, IBLVALHA, NEAVEH, JESUS, GODSENT etc.)

b. Negative, pejorative or derogatory reference to any religion whatsoever are not permitted (e.g. JCSUKS, ILVSATAN, HELL etc.).
c. Any meaning implying the superiority or exclusivity of one religion or creed over others or proselytizing statements are prohibited (e.g. NLYJCSVS, NLYALLAH, ONLJUDSM etc.).

### 5.2.4 Drugs and Alcohol

a. Promotion of drugs, including any reference to substances, paraphernalia, sale of, use of, purveyors; or physiological state produced by any drug or narcotic, either legal or illegal, which would impair operation of a motor vehicle is not permitted (e.g. KRAKHEAD, RXFILLER etc.).
b. All alcohol-related words, including names of brands, types, producers, purveyors; or the physiological state produced by alcohol is strictly prohibited (e.g. PINOT, PI55ED, V0DKA, JACKTRIG, LCB0 etc.).

### 5.2.5 Political Figures, Dignitaries and Law Enforcement Officials

a. Political opinion, political slurs, political affiliation or political organizations are prohibited but non-profit advocacy groups (e.g. Ontario Association of Anglers and Hunters), trade unions and trade organizations are permitted.
b. Government, government agencies or government programs, in any language, where the implied message or meaning is negative or derogatory with respect to the specific agency, program or the government (e.g. ZFEDS, IH8OPP, BADGOVT etc.).
c. Falsely suggest an association with a known public institution (e.g. MPP etc.).
d. Misrepresenting a law enforcement entity (e.g. IMOPP etc.).
e. Messaging related to public or well-known figures, including names of politicians, other dignitaries and law enforcement officials or would result in identification (e.g. QUEEN, MCGUINTY etc.).
f. The use of badge numbers by police officers is not permitted (e.g. OPP5964, SGT5964 etc.).

### 5.2.6 Violence and Criminal Activity

a. Violence, discrimination or bias against any individual or class of individuals.
b. An expression of 'fighting words' designed to inflame passions and possibly lead to a violent confrontation (e.g. FIGHT, EFFOF etc.)
c. Any activity which is prohibited by law or a privilege not given by law in Ontario (e.g. MURDER, RAPE etc.)
d. Criminal activity.

e. Disturbing the public peace or the preservation of law and order; includes expressions of affiliations or actions that may be construed to suggest endangerment to the public welfare, illegal activity, organized crime associations; or gang and gang-related terminology (e.g. TERORIST, MAFIA etc.).

### 5.2.7 Human Rights Discrimination

a. Contempt, ridicule or superiority of a race, religion, ethnic origin, ancestry, place of origin, citizenship, creed, color, gender, sexual orientation, age, marital status, family status, physical characteristics, disability or political affiliation (e.g. JAPJOT, RETARD, MENSUCK, H8GAY etc.).

### 5.2.8 Clarity and Readability

a. No more than four identical characters can be used in sequence (e.g. OOOOO).
b. The use of interchangeable letters and numbers is permissible, subject to conformance with all other criteria (e.g. LILL4DY and L1LL4DY and BELOW and 8ELOW etc.).
c. If the selection is deemed to lack clarity or readability then the number of identical characters and the use of interchangeable letters and numbers prescribed above can be restricted.
d. The review committee should still view, when deemed necessary, the plate prior to issuance to determine the plate's clarity and readability as a final check.

### 5.2.9 Graphic and Characters

a. Any combination of graphics and characters chosen that together knowingly have or knowingly imply an offensive message or violate the contract of the Graphic Plate Partner will not be allowed even though the graphic or chosen characters individually may not be offensive nor have the same meaning as when combined (e.g. "give blood" graphic and JOHOVA, "OSPCA" graphic and H8DOG etc.).

### 5.2.10 Trademarks

The Panel has recommended that the MTO consider establishing criteria around the use of trademarks on licence plates, pending advice from legal counsel.

## 5.3 REVIEW OF PROPOSED CRITERIA

Staff in the Licensing Administration Office and ServiceOntario reviewed 101 licence plate applications using the proposed criteria to determine if the new criteria provided

the necessary level of guidance and clarity of direction for the review of PLP applications.

The result of the exercise showed that the review committee had correctly interpreted and applied the proposed criteria and the Panel's underlying intent on the vast majority of plate applications. The review committee also identified issues and challenges which they experienced in using and interpreting the proposed criteria, and highlighted points where greater clarity or direction was required.

The issues and points raised by the review committee helped the Panel refine the proposed criteria, achieving the finalized version. In addition, the Panel agreed that more examples within the criteria would be beneficial to the review committee.

# 6.0 PLP PROCESS AND STRUCTURE

The Panel discussed all current PLP processes and reviewed them from the customer's perspective to determine if the processes could be improved to enhance the customer experience.

The current PLP program administrative structure was also assessed to establish whether it should be modified to improve either customer service or the operational efficiency of the Ministry's administration of the program.

## 6.1 PANEL DISCUSSION

The Panel discussions below focused on the four primary customer interactions of the PLP program:

- New Plate Request and Review Process
- Reconsideration of New Plate Request
- Replacement Plate Process
- Plate Recall Process

A step-by-step review of each process was undertaken and the discussions and recommendations for each process are detailed below.

### 6.1.1 New Plate Request and Review Process

A review of the new plate request and review process was undertaken. On the whole, the Panel largely endorsed and supported the current process.

The table below outlines the key areas of discussion and the Panel's recommendations for this process (see Appendix 8.2 - Proposed PLP New Plate Request and Review Process).

| Process Step | Panel Discussion and Recommendation |
|---|---|
| Application | • Presently there are three channels for customers to apply for a PLP (by telephone, internet or in person).<br>• The Panel recommended that all customers, irrespective of the contact channel, have access to a copy of the criteria.<br>• The Panel recommended that copies of the criteria are produced in simple and easy to understand English for applicants. |

| | |
|---|---|
| Pre-Screening | ▪ The Panel agreed that no changes to the current process step are required and recommended the removal of the interim process whereby all unanimous rejected requests are escalated. |
| Review Committee | ▪ Refer to Section 6.2 - The Review Committee. |
| OCPAC 1[1] | ▪ The Panel agreed that no changes to the current process step are required and recommended the removal of the interim process whereby all unanimous rejected requests are escalated. |
| OCPAC 2[2] | ▪ The Panel agreed that no changes to the current process step are required and recommended the removal of the interim process whereby all unanimous rejected requests are escalated. |
| SMRT | ▪ The Panel briefly discussed whether this level of review could be removed. It was noted that the request will only need to be reviewed by Directors when no unanimous decision is reached by OCPAC 2.<br>▪ The Panel recommended that the review of plate requests should not be referred to SMRT but be handled solely by the Director of LSB. |
| Registrar of Motor Vehicles | ▪ Where there is any ambiguity preventing a decision being reached; the Director of LSB will escalate the request to the Registrar of Motor Vehicles to make the final decision. |

### 6.1.2 Reconsideration of New Plate Request

Presently a reconsideration process is available for applicants whose plate requests have been rejected. The Panel unanimously supported the option for applicants to request reconsideration; however, felt that the process should be more visible and mentioned explicitly to rejected applicants.

The Panel recommended that the reconsideration process, and the steps an applicant needs to follow, should be stated clearly in the rejection letter. The Panel agreed that any request for reconsideration should follow the current process steps (i.e. from the review committee to, ultimately, the Registrar).

### 6.1.3 Replacement Plate Process

The replacement plate process is handled solely by ServiceOntario. Under the interim PLP process it was decided by the Premier to introduce a 'grandfathering' process where replacement plates are not screened by staff but simply replaced. As a

[1] OCPAC 1(Own Choice Plate Approval Committee) - Comprised of one Manager from ServiceOntario and one Manager from MTO.
[2] OCPAC2 - Comprised of one Manager from ServiceOntario and one Manager from MTO. These Managers are at a higher-level than those in OCPAC 1.

consequence, a replacement plate can only be pulled from circulation if it is recalled by the Registrar as a result of a complaint that is subsequently upheld.

The Panel agreed unanimously with the current 'grandfathering' process and supported the on-going adoption of the process to deal with all replacement plates going forward. The Panel believes that this process will prevent future "REV JO" episodes.

### 6.1.4 Recall Plate Process

Presently, a plate may be recalled on the basis of a complaint from a member of the public; and the decision to recall a plate rests solely with the Registrar.

#### 6.1.4.1 Current Recall Plate Process

The current process was outlined to the Panel; namely:

1. Complaint received by a ministry.
2. MTO will undertake research on the plate to determine if it falls within the criteria.
3. The review committee will evaluate the plate in question based on the review criteria and make a recommendation to recall or not.
4. The complaint is escalated to OCPAC 1 and OCPAC 2 for review and recommendation.
5. The complaint is escalated to SMRT who can decide if the complaint has any merit to recommend recall. If so, it is escalated to the Registrar to make the final decision. If not, the complaint is rejected and the complainant informed of the decision by MTO.
6. A recall package is prepared if SMRT recommend to recall the plate. The recall package will include any similar licence plates currently in circulation.
7. The recall package is reviewed by the Registrar to make the decision on whether to recall the plate on the basis of the complaint.
8. If the plate is to be recalled the plate owner is notified and instructed to return the plate to MTO.
9. The complainant is notified of the decision reached by the Registrar.

During the recall process only SMRT or the Registrar can make a decision to not recommend recall - even if the review committee and OCPAC 1 and 2 believe the complaint has no merit and that the licence plate in question is not offensive or inappropriate.

#### 6.1.4.2 Proposed Recall Plate Process

The Panel feels that the review committee members are the criteria experts and that therefore, if they determine unanimously that a plate should not be recalled, then the recall process should end and it should not be escalated up the reporting chain as is presently done (see Appendix 8.3 - Proposed PLP Recall Process).

In addition, the Panel recommended that the recall plate process should mirror the new plate request and review process; in that the process would end when a unanimous decision not to recommend recall is reached at any level. The decision to recommend recall would still, ultimately, rest with the Registrar.

#### 6.1.4.2.a Breadth of Recall

Once a complaint is received, the plate is researched and the criteria are applied. If the decision is to recall the plate, MTO will research other similar configurations that are in circulation and will include this information as part of a recall package that is prepared for the final approval of the Registrar.

The Panel felt that in respect of the principle of fairness and consistency that if one plate is deemed to be offensive enough to recall, then all similar plates should also be recalled by the Registrar at the same time. It was the Panel's view that it was good practice to deal with all offensive plates in one step and not use an ad-hoc, piecemeal approach.

It was agreed by the Panel that to ensure greater transparency of the PLP program the recall letter should specify the criteria that the recalled plate has fallen within.

#### 6.1.4.2.b Plate Registrant Involvement

The Panel was concerned that a plate registrant is not involved in the recall process; in fact, the plate registrant is only informed of the process when a decision is made to recall the licence plate.

The Panel recommended that if a complaint and recommendation to recall reaches the Registrar, that the registrant should be notified that a complaint has been received about their plate and that it is currently being investigated.

The plate owner should have 15 days from receipt of the notification to provide MTO with any information that supports the continuing use of the plate. This will ensure that a plate owner receives a more customer-friendly initial contact than a formal recall letter; as is currently the case.

#### 6.1.4.2.c Standards for Recall

The Panel felt that the standards applied to make a decision on potential plate recalls should be different (and use a higher threshold of offense) than those used for new applications. In other words, the Panel felt that the level of offense needs to be more blatant and the likelihood to offend much greater, in order to justify a recall, even if a similar or identical new application would be denied.

This higher-level standard would require MTO to exercise greater discretion in evaluating plates prior to making a decision to recall.

#### 6.1.4.2.d Reconsideration of Recall

The Panel believes that registrants of recalled plates should have the opportunity to have the decision reconsidered. Under the proposed new process, however, plate owners have the opportunity to provide information to MTO before the final decision to recall is undertaken, creating potential redundancy or inefficiency.

The Panel agreed that if a plate owner can provide new information not available previously, then the plate owner could still apply for reconsideration.

### 6.2 THE REVIEW COMMITTEE

The Panel wished to explore the make-up of the review committee to ensure that it was balanced and reflected the citizens of Ontario. Currently, there are nine committee members (three from MTO and six from ServiceOntario) of which all but one are female.

It was the view of the Panel that diversity in the review committee would be beneficial to the PLP program. The Panel discussed the possibility of opening up the review committee to include citizens of Ontario who would be subject matter experts on a number of the criteria. It was decided, however, that the complexity in setting up a public advisory committee would outweigh any added value.

The Panel then explored using the staffing resources that the ministries currently have at its disposal. It was felt by the Panel that the ministries should have a sufficient mix of employees to satisfy the diversity criteria of the review committee.

The Panel recommended that the composition of the review committee be amended to take into account the need for a more culturally diverse committee and the Panel feels that this can be accomplished by utilizing staff currently employed by both ministries.

The Panel wanted to note; however, that it thought the present committee members are important to the stability of the process. As a result, the size of the review committee may need to be increased from its current membership of nine to make sure that diversity is captured while retaining continuity. In addition, the review process may need to be formalized so that new members have a clear understanding of their role and responsibilities.

## 6.3 RELATIONSHIP TO GRAPHIC PLATE PROGRAM

The graphic plate program allows organizations to use associated graphics on both personalized and regular issue licence plates.

The Panel recommended that to promote program consistency (consistent with the principles of preventing embarrassment to the Crown, simplicity, promoting fairness and consistency, and transparency) the graphic plate program should be guided by the same set of criteria used for the PLP program. This would ensure that a graphic does not appear on a plate when the associated word would be prohibited (e.g. graphic of a rifle).

## 6.4 PLP PROGRAM DATABASE

Currently there is no single repository of data for personalized plate applications that have been either approved or rejected. Approved plates appear on the MTO system of motor vehicles while rejected plates are stored on a standalone ServiceOntario department database. This significantly impairs the ability of the review committee to tap a knowledge base of previous decisions, relying instead on personal recollections and "tribal knowledge." This creates both inefficiencies and inconsistent decision-making.

The Panel recommended that a single database with the functionality of recording decisions and rationale for rejection would speed up the process of reviewing new plate requests. The Panel was concerned that the current practice relies too heavily on the individual members of staff to provide institutional memory and provide a living knowledge base, and felt that a dedicated system to support the committee would provide greater program integrity and consistency.

## 6.5 TRAINING ON PROPOSED PROCESS AND CRITERIA

The Panel raised concerns about the roll-out of the proposed criteria and changes to the PLP process. The Panel recommended that the review committee receive training on the proposed criteria so that they are fully conversant with the changes.

The Panel also believes that a more formalized training program may be necessary to train and coach new members of the review committee.

## 6.6 PLATES FOR NON-VEHICULAR USE

The Panel discussed plate requests for non-vehicular purposes (e.g. a bar-owner who wants to hang a plate in their bar). It was the Panel's opinion that because the MTO and ServiceOntario could not determine, at the point of request, whether a plate would be for vehicular or non-vehicular use then it should consider all plate requests as fit for display on vehicles.

In addition, it was generally agreed by the Panel that the MTO should not enter the realm of issuing non-vehicular plates; especially when there are companies that produce and sell plates for non-road use.

## 6.7 FORMAL POLICY DOCUMENT AND CHANGE CONTROL

The Panel felt that there was a need to instigate a change control process around the review criteria to maintain the integrity of the proposed criteria and to prevent the review committee receiving new interpretative direction that may contradict the proposed criteria and supporting examples.

It was the recommendation of the Panel that a policy document on the PLP program should be compiled and that any amendments to the program, processes or criteria would need to be formally documented (i.e. all policy manuals) and the change requests approved and signed off by the Registrar.

# 7.0 RECOMMENDATIONS

## 7.1 SUMMARY OF RECOMMENDATIONS

Although the recommendations of the Panel on the PLP program are contained in the body of this report, for ease of reference the table below summarizes the recommendations - noting the paragraph reference, page number and supporting principle.

| Ref | Panel Recommendation | Principle | Page |
|---|---|---|---|
| 5.1.1 | Remove the term 'innocuous' in the criterion of 'Sexual' as it does not matter if an applicant believes their plate to be innocuous if the meaning could be misconstrued. | 2, 4, 10 | 11 |
| 5.1.2 | No licence plate is to be issued that could reasonably be expected to cause offense to any identifiable group. | 2, 4, 10 | 11 |
| 5.1.2 | Review committee should continue to explore phonetics, mirror images, slang, abbreviations and text-messaging vernacular to filter out obscene, derogatory and offensive requests. | 2, 9, 10, 11, 13 | 11 |
| 5.1.3 | Positive expressions of religious beliefs, titles, biblical passages, celebrations, symbols and mythology should be allowable. | 2 | 12 |
| 5.1.3 | The review committee should consult with external subject matter experts to obtain information if research is inconclusive. | 9, 11, 13 | 12 |
| 5.1.4 | All forms of drugs, legal or illegal, that could impair driving and alcohol-related words should be prohibited on personalized licence plates. | 4, 6, 7, 9 | 12 |
| 5.1.5 | Names of politicians and other public figures should be banned under the criterion of Dignitaries and Law Enforcement Officials. | 2 | 13 |
| 5.1.5 | Re-name the criterion Political Figures, Dignitaries and Law Enforcement Officials. | 6, 9 | 13 |
| 5.1.6 | Continue to reject plate applications that contain terms and words related to violence (including weaponry) and criminal activity. | 2, 4, 6, 7, 9, 10, 11, 12 | 13 |
| 5.1.7 | Re-name the criterion of Racism to Human Rights Discrimination and modify the category to align it with the Human Rights Code. | 6, 7, 13 | 13 |
| 5.1.8 | Remove the criterion of Road Safety. | 2 | 14 |
| 5.1.9 | Re-name the criterion of Law Enforcement Purposes to Clarity and Readability. | 6, 13 | 14 |

| | | | |
|---|---|---|---|
| 5.1.9 | No more than four identical characters should be used on a licence plate (e.g. OOOO). In cases of four identical characters then the review committee should view a mock-up as a final check before approval. | 3, 6, 7, 8, 9 | 14 |
| 5.1.9 | All variations of similar licence plates (e.g. BELOW and 8ELOW) using interchangeable letters and numbers are permitted; subject to all other criteria. | 3, 6, 7, 8, 9 | 14 |
| 5.1.11 | New criterion of Trademarks to be explored and adopted as a constraint by the MTO following further legal advice. | 7, 9 | 15 |
| 6.1.1 | Information on the review criteria should be made available to all applicants irrespective of the contact channel used to access the PLP program. The information needs to be produced in simple and easy to understand English. | 6, 7, 13 | 19 |
| 6.1.1 | Review of plate applications should not be referred to SMRT but be handled solely by the Director of LSB. | 3, 8 | 19 |
| 6.1.2 | The reconsideration process for new plate requests should be stated clearly in the rejection letter. | 6, 7, 12, 14 | 20 |
| 6.1.3 | Grandfathering process should be formalized and adopted as the on-going process to deal with all replacement plates. | 2, 9 | 20 |
| 6.1.4.2 | The review committee, OCPAC 1 and 2 can determine by a unanimous decision not to recommend recall. | 9, 13 | 22 |
| 6.1.4.2.a | If a decision is made to recall a plate then all similar plates should also be recalled. | 12 | 22 |
| 6.1.4.2.b | Plate owner(s) to be notified of potential recall if complaint reaches the Registrar. | 7 | 22 |
| 6.1.4.2.b | Plate owner(s) to have the opportunity to provide information to the Registrar prior to a decision being made on recall. | 7 | 22 |
| 6.1.4.2.c | The standards to decide whether to recall a plate need to be at a higher-level (i.e. the level of offense needs to be blatant and the probability of likelihood to offend greater). | 2, 11 | 23 |
| 6.1.4.2.d | Owners of recalled plates should have the option to apply for reconsideration if they can provide new or additional information not available previously. | 7, 12 | 23 |
| 6.2 | The composition of the review committee needs to be amended to be more culturally diverse. | 6, 9 | 23 |
| 6.2 | The review committee process needs to be formalized so that new members have a clear understanding of their role and responsibilities. | 6 | 23 |
| 6.3 | The graphic plate program should be governed by the same set of criteria used for the PLP program. | 7, 12 | 24 |
| 6.4 | Creation of a single database listing approved and rejected licence plate requests with the functionality to record decisions and rationale for the plate. | 3, 6, 7, 12 | 24 |
| 6.6 | Creation of PLP program policy document. | 5, 13 | 25 |

# 8.0 APPENDICES

## 8.1 CURRENT AND PROPOSED CRITERIA

| CURRENT CRITERIA | PROPOSED CRITERIA |
|---|---|
| **Sexual**<br>• Sexual messaging or sexual connotation other than innocuous comments accepted by the ministry at the time of application, includes reference to a sexual body part, a term for or most closely associated with a sex act, or the availability for sex (i.e. RIDEME, PIMPIN)<br>• Breasts, genitalia, pubic area, buttocks, or relate to sexual and eliminatory functions (i.e. BUBBIES, THRUST) | **Sexual**<br>a. Sexual messaging or sexual connotation including reference to sexual body parts such as breasts, genitalia, pubic area, buttocks or relating to sexual and eliminatory functions, a term for or most closely associated with a sex act, or the availability for sex (e.g. BUBBIES, MYBUMPS, THRUST, RIDEME, PIMPIN etc.).<br><br>**Summary of Proposed Change:**<br><br>• Removal of the phrase, "other than innocuous comments accepted by the ministry at the time of application". |
| **Abusive/Obscene Language/Derogatory Slang**<br>• Abusive, vulgar, derogatory, obscene or profane language (LILHOZR, IH8EVRY1)<br>• A known slang term in any language, abbreviation, phonetic spelling or mirror image (i.e. NEVAEH)<br>• Term of lust or depravity or carries a prurient meaning, or which may otherwise be vulgar or indecent (i.e. WETTVETT)<br>• Swear word or term considered profane, obscene or repulsive (SH1T)<br>• Word or saying in a foreign language, which can be translated to mean something offensive (i.e. BUKAKE) | **Abusive, Obscene Language and Derogatory Slang**<br>a. Abusive, vulgar, derogatory, obscene or profane language (e.g. LILHOZR, IH8EVRY1 etc.).<br>b. A known slang term in any language, abbreviation, phonetic spelling, text-messaging vernacular or mirror image (e.g. STUCATZZ etc.).<br>c. Term of lust or depravity or carries a prurient meaning, or which may otherwise be vulgar or indecent (e.g. HUMMERZ, WETTVETT etc.).<br>d. Swear word or term considered profane, obscene or repulsive (e.g. SH1T, FCUK etc.).<br>e. Word or saying in a foreign language, which can be translated to mean something offensive (e.g. BUKAKE, FUNGOOO etc.).<br><br>**Summary of Proposed Change:**<br><br>• Removal of the HEAVEN as an example, as religion is a proposed allowable criteria.<br>• Added text-messaging vernacular to the proposed criteria. |

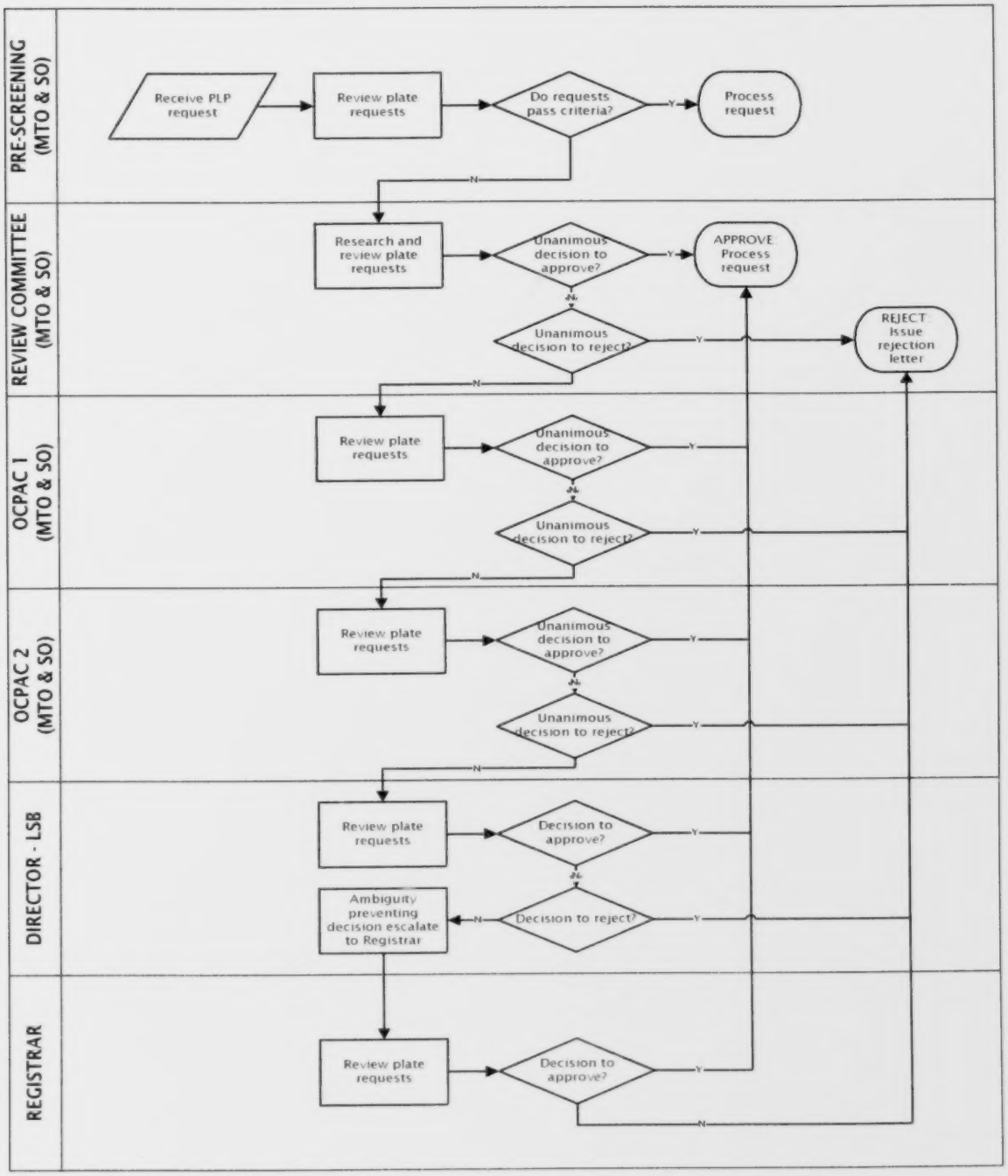
| CURRENT CRITERIA | PROPOSED CRITERIA |
|---|---|
| **Religion**<br>• Religion, religious messaging either positive or negative, religious affiliations, religious slurs or names that are known to have a negative connotation, even if the religious name requested is the name of the requestor (i.e. GODSENT, JESUS) | **Religion**<br>a. Positive or neutral expressions of religious beliefs and mythology are permissible; including references to religious celebrations, titles, leaders and symbols. All religions and beliefs are permissible (e.g. Christianity, Judaism, Islam, Sikhism, Hinduism etc.) subject to the constraints below (e.g. IBLVJC, IBLVALAH, NEVEAH, JESUS, GODSENT etc.).<br>b. Negative, pejorative or derogatory reference to any religion whatsoever are not permitted (e.g. JCSUKS, ILVSATAN, HELL etc.).<br>c. Any meaning implying the superiority or exclusivity of one religion or creed over others or proselytizing statements are prohibited (e.g. NLYJCSVS, NLYALLAH, ONLJUDSM etc.).<br><br>**Summary of Proposed Change:**<br>• This entire criterion has been rewritten to allow for limited religious expression. Presently there are no religious meanings permitted. |
| **Drugs/Alcohol**<br>• Promotion of the use of alcohol or drugs, includes any reference to substance, paraphernalia, sale, user, purveyor of, or physiological state produced by any illicit drug, narcotic or intoxicant (i.e. KRAKHEAD, RXFILLR) | **Drugs and Alcohol**<br>a. Promotion of drugs, including any reference to substances, paraphernalia, sale of, use of, purveyors; or physiological state produced by any drug or narcotic, either legal or illegal, which would impair operation of a motor vehicle is not permitted (e.g. KRAKHEAD, RXFILLER etc.).<br>b. All alcohol-related words, including names of brands, types, producers, purveyors; or the physiological state produced by alcohol is strictly prohibited (e.g. PINOT, PI55ED, V0DKA, JACKTRIG, LCB0 etc.).<br><br>**Summary of Proposed Change:**<br>• Some additional clarity is offered to underscore that the prohibition relates to anything which may lead to impairment of motor vehicle operation (even if the substance is legal, such as alcohol or prescription drugs). |

| CURRENT CRITERIA | PROPOSED CRITERIA |
|---|---|
| **Dignitaries/Law Enforcement Officials**<br>• Political opinion, political slur, political affiliation or political organizations but does not include non-profit advocacy groups (i.e. Ontario Association of Anglers and Hunters), or unions or trade organizations<br>• Government, governmental agency or government program, in any language, where the added message or meaning is negative or derogatory with respect to the specific program or the government (i.e. ZFEDS)<br>• Knowingly falsely suggest an association with a known public institutions<br>• Misrepresents a law enforcement entity<br>• Messaging related to public or well-known figures, including members of the government, other dignitaries and law enforcement officials or would cause identification (i.e. Queen etc.) | **Political Figures, Dignitaries and Law Enforcement Officials**<br>a. Political opinion, political slurs, political affiliation or political organizations are prohibited but non-profit advocacy groups (e.g. Ontario Association of Anglers and Hunters), trade unions and trade organizations are permitted.<br>b. Government, government agencies or government programs, in any language, where the implied message or meaning is negative or derogatory with respect to the specific agency, program or the government (e.g. ZFEDS, IH8OPP, BADGOVT etc.).<br>c. Falsely suggest an association with a known public institution (e.g. MPP etc.).<br>d. Misrepresenting a law enforcement entity (e.g. IMOPP etc.).<br>e. Messaging related to public or well-known figures, including names of politicians, other dignitaries and law enforcement officials or would result in identification (e.g. QUEEN, MCGUINTY etc.).<br>f. The use of badge numbers by police officers is not permitted (e.g. OPP5964, SGT5964 etc.).<br><br>**Summary of Proposed Change:**<br>• Exclusion of names of political figures and greater clarity on the rejection of badge numbers. |

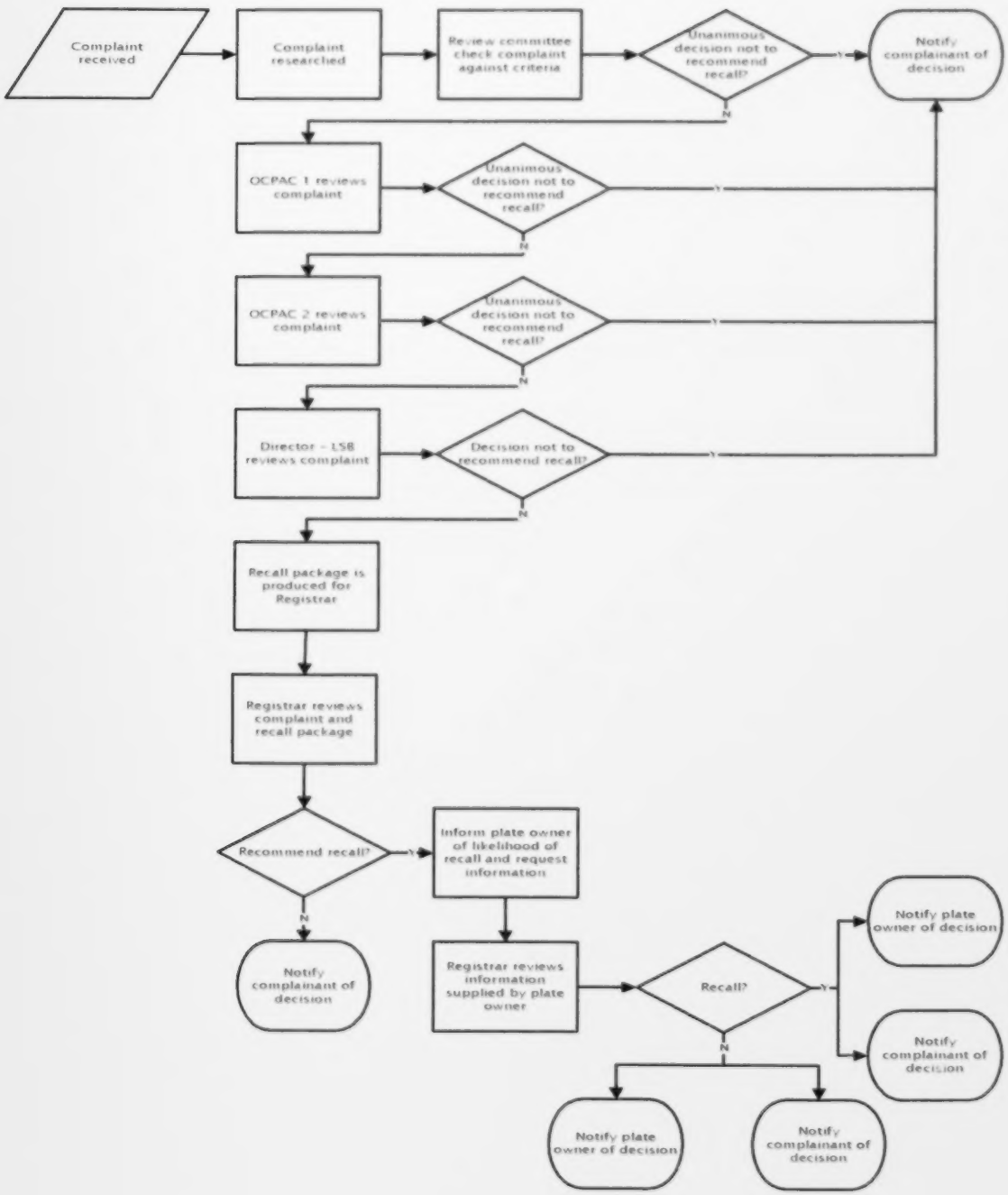
| CURRENT CRITERIA | PROPOSED CRITERIA |
|---|---|
| **Violence/Criminal Activity**<br>• Violence, discrimination or bias against any individual or class of individuals<br>• An expression of 'fighting words' designed to inflame passions and possibly lead to a violent confrontation (i.e. FIGHT, EFFOF)<br>• Any activity which is prohibited by law or a privilege not given by law in Ontario (i.e. MURDER, RAPE)<br>• Criminal activity<br>• Disturbing the public peace or the maintenance of law and order; includes expressions of affiliations or actions that may be construed to suggest endangerment to the public welfare or illegal activity, organized crime associations or gang or gang terminology (i.e. TERORIST, MAFIA) | **Violence and Criminal Activity**<br>a. Violence, discrimination or bias against any individual or class of individuals.<br>b. An expression of 'fighting words' designed to inflame passions and possibly lead to a violent confrontation (e.g. FIGHT, EFFOF etc.)<br>c. Any activity which is prohibited by law or a privilege not given by law in Ontario (e.g. MURDER, RAPE etc.)<br>d. Criminal activity.<br>e. Disturbing the public peace or the preservation of law and order; includes expressions of affiliations or actions that may be construed to suggest endangerment to the public welfare, illegal activity, organized crime associations; or gang and gang-related terminology (e.g. TERORIST, MAFIA etc.).<br><br>**Summary of Proposed Change:**<br>• No change. |
| **Racism**<br>• Contempt, ridicule or superiority of a race, religion, deity, ethnic heritage, ancestry, place of origin, citizenship, creed, color, gender, sexual orientation, age, marital status, family status, physical characteristics, handicap or political affiliation (i.e. JAPJOT, RETARD) | **Human Rights Discrimination**<br>a. Contempt, ridicule or superiority of a race, religion, ethnic origin, ancestry, place of origin, citizenship, creed, color, gender, sexual orientation, age, marital status, family status, physical characteristics, disability or political affiliation (e.g. JAPJOT, RETARD, MENSUCK, H8GAY etc.).<br><br>**Summary of Proposed Change:**<br>• The criterion was re-named to reflect the fact that it prohibits multiple forms of human rights discrimination, not only racism.<br>• The word deity was removed as it was considered redundant to "religion".<br>• "Ethnic heritage" has been re-worded as "ethnic origin".<br>• The word "handicap" has been replaced with "disability," so that the wording of the criterion is more in line with the vernacular of the Ontario Human Rights Code. |

| CURRENT CRITERIA | PROPOSED CRITERIA |
|---|---|
| **Road Safety**<br>• Any configuration contrary to road safety, such as speeding, drag racing, race car competitions. | • ***Removed*** as a criterion. |
| **Law Enforcement Purposes**<br>• Selection is such that it is not clearly identifiable for law enforcement purposes (i.e. ODODOPS, VWVWVWVW) | **Clarity and Readability**<br>a. No more than four identical characters can be used in sequence (e.g. OOOOO etc.).<br>b. The use of interchangeable letters and numbers is permissible, subject to conformance with all other criteria (e.g. LILL4DY and L1LL4DY, BELOW and 8ELOW etc.).<br>c. If the selection is deemed to lack clarity or readability then the number of identical characters and the use of interchangeable letters and numbers prescribed above can be restricted.<br>d. The review committee should still view, when deemed necessary, the plate prior to issuance to determine the plate's clarity and readability as a final check.<br>**Summary of Proposed Change:**<br>• Greater clarity on what is permissible. |
| **Graphic + Characters**<br>• Any combination of graphics and characters chosen that together knowingly have or knowingly imply an offensive message will not be allowed even though the graphic or chosen characters on their own are not offensive nor have the same meaning as when combined (BEEVER with "I heart" graphic) | **Graphics and Characters**<br>a. Any combination of graphics and characters chosen that together knowingly have or knowingly imply an offensive message or violate the contract of the Graphic Plate Partner will not be allowed even though the graphic or chosen characters individually may not be offensive nor have the same meaning as when combined (e.g. "give blood" graphic and JOHOVA, "OSPCA" graphic and H8DOG etc.).<br>**Summary of Proposed Change:**<br>• Use of different examples. |
| **Trademarks**<br>• No current criterion. | **Trademarks**<br>• The Panel has recommended that the Ministry consider establishing criteria around trademark use, pending advice from Legal Counsel. |

## 8.2 PROPOSED PLP NEW REQUEST AND REVIEW PROCESS



## 8.3 PROPOSED PLP RECALL PROCESS



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